

WYATT & ASSOCIATES

EMPLOYMENT LAW, HR SOLUTIONS

Katherine Gabriel, Esq
Katherine@wyattlegalservices.com
P: 603-357-1111 F: 603-685-2868

Main Office: 17 Elm Street Suite C211 Keene NH 03431
New York Office: 418 Broadway 2nd Floor Albany NY 12207

VIA ECF

April 19, 2022

Hon. Katharine H. Parker
United States Magistrate Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street, Room 1330
New York, NY 10007

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #: _____
DATE FILED: 4/19/2022

The conference scheduled for April 21, 2022 is hereby adjourned to a telephone conference on May 31, 2022 at 3:45 p.m. Counsel for the parties are directed to call into the Court's conference line: 866-434-5269; access code: 4858267 at the scheduled time.

RE: Amanda Cintron v. Albert Einstein College of Medicine, et al.

Docket No.: 1:21-cv-06256-JGK

Joint Request for Adjournment of Pre-Motion Conference Scheduled

SO ORDERED:

Katharine H. Parker
HON. KATHARINE H. PARKER
UNITED STATES MAGISTRATE JUDGE
4/19/2022

Dear Judge Parker:

The parties to the above-captioned action hereby write jointly to respectfully request that the Court adjourn the pre-motion conference currently scheduled for April 21, 2022 at 4:00pm.

On March 29, 2022, the parties appeared for a pre-motion conference to discuss Plaintiff's motion to compel. (Dkt. # 19). The Court found that the dispute was premature and directed the parties to develop the record through deposition testimony (specifically, the deposition of Joseph Ben-Ari), to meet and confer following any depositions, and be prepared to revisit the dispute before the Court in the event the parties could not reach an agreement (Dkt. # 26).

The parties worked diligently to schedule the deposition of Ben-Ari as soon as reasonably possible. Importantly, Plaintiff proposed a number of dates in April, but unfortunately these dates did not work for Defendants, including Mr. Ben-Ari. The parties have now conferred on a date and noticed the deposition of Ben-Ari for May 9, 2022. In addition, the parties have also conferred and tentatively agreed on the date for the deposition of Robert Cancellieri. The Plaintiff has also noticed a 30(b)(6) deposition and the parties are currently negotiating topics for the 30(b)(6) deposition, which will allow for the parties to proceed with additional depositions without further delays.

The parties do not believe they will be prepared to fully brief the Court by April 21, 2022 on the pending discovery dispute and would respectfully request that the pre-motion conference be adjourned to a date after May 9, 2022.

Additionally, as the close of fact discovery is currently scheduled for May 12, 2022, the parties intend to file a joint request for an extension of discovery dates, to give the parties more time to fully conduct necessary discovery (including resolving the pending dispute), as well as prior to scheduling and conducting necessary depositions.

WYATT & ASSOCIATES

EMPLOYMENT LAW, HR SOLUTIONS

Katherine Gabriel, Esq
Katherine@wyattlegalservices.com
P: 603-357-1111 F: 603-685-2868
Main Office: 17 Elm Street Suite C211 Keene NH 03431
New York Office: 418 Broadway 2nd Floor Albany NY 12207

Respectfully submitted,

By her attorneys

THE PLAINTIFF
Amanda Cintron



KATHERINE GABRIEL
Bar Roll #: 5782487

Attorneys for Plaintiff
Law Offices of Wyatt & Associates
17 Elm Street, Suite C211
Keene, NH 03431

New York Office:
418 Broadway, 2nd Floor
Albany, NY 12207

Dated: April 19, 2022